

V
Apple Inc., One Infinite Loop, Cupertino, CA 95014
(Defendant)

Comes Now, Darren Tramell Hughes and moves this Court, to allow plaintiff to file suit against said Defendant Apple Inc, for an illegal arrest, illegal search and seizure, unnecessary use of force, and shows the Court:

In cause number 1494203, in the 179th District Court of Harris County, Texas, where Plaintiff entered Apple Store located in the Galleria Mall and inquired if a phone line was eligible for an upgrade. Apple Store employee said he was having difficulties with his handheld device and would be back momentarily. Said employee came back out and not long after the Plaintiff was approached from behind by two plain clothe individuals and told to put his hands behind his back and Plaintiff asked who they were and Joseph Hoesel stated "Don't fucking worry about", and told Plaintiff not to create a scene and that he was being detained and Plaintiff tried to walk out the store and Joseph Hoesel, later identified as an Apple Store

Loss Prevention Investigator and another employee, tackled Plaintiff by force to the ground and wrestled Plaintiff down using brute force and forced Plaintiff into handcuffs, forced Plaintiff to the back of the store, and illegally placed Plaintiff under arrest, then illegally searched Plaintiff, and seized ~~evidence~~ used to prosecute Plaintiff falsely. The Complaint in the 149403 cause number in 179th District Court is evidence and confirms Joseph Hoesel in his official capacity violated Plaintiff's rights on November 28th, 2015, at the Galleria Mall, in Houston, Texas. Not only did Joseph Hoesel use force, illegal arrest, illegally searched and seize, but also inflicted pain and suffering on Plaintiff wherein handcuffs were placed so tight on Plaintiff they left cuts on both wrist, physically harmed by body weight of Joseph Hoesel and other employee who pounced on Plaintiff and slammed him to the ground and wrestled to handcuff him. Plaintiff, moves this court to award him 4.7 million dollars from Apple Inc. for violating his civil and constitutional rights. Plaintiff asks this court to appoint counsel seeing

Plaintiff is in jail currently still fighting the case that was commenced against Plaintiff because of the incident. Plaintiff has limited access to law library and courts and appointment of Counsel would be an opportunity for Plaintiff to prepare for trial, and gather other evidence needed in this case, such as legal documents naming Joseph Hoesel Apple Inc., employee in the indictment and other evidence that may be needed. Apple Inc., is responsible for the illegal actions of their Loss Prevention Officer. Plaintiff has limited knowledge of the law and needs counsel due to any complex issues he may not understand.

July 18th, 2020

Respectfully
Submitted



Darren Hughey (01835383)
Harris County Jail (5C1)
701 N San Jacinto
Houston Tx 77002